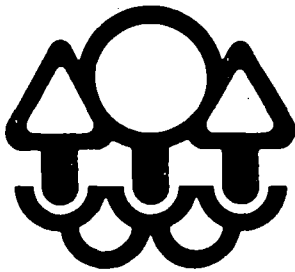




514576



Minnesota Pollution Control Agency

February 5, 1981

Mr. Rich Bartelt
Superfund Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Mr. Bartelt:

Enclosed is the State of Minnesota submittal to the Environmental Protection Agency (EPA), Region V, for the Reilly Tar and Chemical Site in St. Louis Park, Minnesota. This submittal, with supporting information, was prepared by the Minnesota Pollution Control Agency (MPCA) and the Minnesota Department of Health (MDH) pursuant to our discussions and meetings with EPA Region V staff and in response to the information requirements for Category C and D sites as identified in the Michael B. Cook memorandum dated January 19, 1981. As the EPA headquarter's memorandum indicated, although Superfund monies are not now available, the EPA Fiscal Year 1981 budget did include contract funds for carrying out Category A (Site Investigation) and Category B (Field Investigation and Feasibility Studies) activity, and through an amendment an additional \$2.8 million was authorized for Category C (Engineering Design Work). Given that the Reilly Tar and Chemical Site is the highest ranking hazardous waste site problem in Minnesota and that certain elements of the clean-up effort at the site can progress by June of 1981 to a point where clean-up activity can begin, the State of Minnesota believes that the site should be allocated Fiscal Year 1981 contract support funds by the EPA.

The MPCA and the MDH have prepared this submittal to you so that it addresses in a comprehensive way all of the information items listed on page two of the January 19, 1981 EPA headquarter's memorandum. The separate information items are specifically addressed by means of attachments to this cover letter.

A listing of the attachments and their relationship to the EPA headquarter's memorandum items is as follows:

003579

Phone: 612/296-7339

1935 West County Road B2, Roseville, Minnesota 55113
Regional Offices · Duluth/Brainerd/Detroit Lakes/Marshall/Rochester
Equal Opportunity Employer



Headquarter Memorandum Information Items

Attachment Providing
Information in
Response to Request

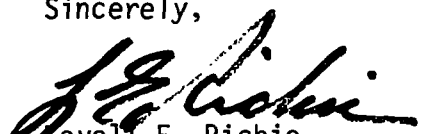
- | | |
|---|------------------------------|
| 1. Description and Cost Estimates for Contract Support | Attachment B |
| 2. Description and Cost Estimates for Community Public Participation Program | Attachment C |
| 3. Detailed Project Schedule | Attachment A
(Section II) |
| 4. Status of EPA/State Cooperative Agreement for Cost Sharing, Post Closure Operations, and Availability of Hazardous Waste Disposal Facilities | Attachment D |
| 5. State Capability to Carry Out Actions Proposed for the Site | Attachment E |
| 6. Feasibility for a Phased Approach to Undertake Remedial Measures at the Site and a Schedule | Attachment A
(Section I) |

Minnesota would like to designate two State coordinators for the implementation of Reilly Tar and Chemical Site plans and clean-up activity, one person from the MPCA and another person from the MDH. I will be the coordinator for the MPCA and Mr. Roger DeRoos will be the coordinator for the MDH. The MPCA and MDH have been the two State agencies coordinating investigation and response activity for the Reilly Tar and Chemical Site in the past and will continue to do so in the future.

The MPCA and MDH staff appreciate the cooperation and effort of the EPA Region V staff on this Reilly Tar and Chemical Superfund candidate in the past and look forward to your continuing efforts in the future.

If you have any questions regarding this submittal, please contact either State coordinator.

Sincerely,


Lovell E. Richie
Senior Executive Officer

LER/dc

003580

ANTICIPATED STATE INVOLVEMENT

The Minnesota Pollution Control Agency (MPCA) is responsible for ensuring that all facets of the project are successfully carried out. The MPCA will accomplish this by providing a staff hydrologist at a commitment of 75% of full time to directly oversee the project. The staff hydrologist will review the adequacy of the work and resolve problems that may arise during the project. The staff hydrologist's responsibilities at the MPCA include: investigate potential groundwater contamination problems, coordinate with appropriate agencies, review detailed plans of study, review all pertinent reports, and recommend mitigative measures as necessary for hearings and court actions.

The MPCA's Public Information Office has prepared a Community Relations program (Appendix G) utilizing the Interim Community Relations Guidance for site clean-up, prepared by Michael B. Cook. The citizen concern and technical complexity of the engineering plans were judged medium, as defined in the guidance memo. The community relations plan is consistent with the guidelines for medium community concern and medium technical complexity. The MPCA Public Information Office is responsible for executing the program.

The State agrees to provide 5% matching funds.

The project will be initiated on or about June 1, 1981 and completed on March 1, 1982. During this period, the MPCA will conduct meetings the first Tuesday of every month with the contractor to assess the progress of the project. Progress reports will be prepared by the contractor and delivered to USEPA and MPCA three working days prior to each meeting. The progress reports will highlight the activities of the previous month, project work for the following month, highlight problems encountered and the solutions implemented including impacts

002682

on the work statement or expected costs, summarize costs and provide a revised schedule.

Upon completion of the project a draft report will be submitted by the project consultant to the MPCA and USEPA for comment, and approval. The consultant will then take the comments into consideration and submit a Final Technical Report for approval. The report will include a description of the completed tasks and any deviations in the original scope and associated costs. The final report will then be submitted, with a project assessment by the MPCA, to the EPA for approval.

ANTICIPATED EPA INVOLVEMENT

The EPA will provide 95% of the funds needed for detailed planning studies that are needed for remedial actions at the former Reilly Tar and Chemical site. In addition, the EPA will provide technical, fiscal, and administrative assistance to the MPCA to carry out the proposed studies, and take such legal actions as necessary to recover costs incurred. EPA will monitor the project and stay current with developments and ensure Superfund program requirements are met. These requirements include, at a minimum, ensuring the consultant prepares adequate Draft and Final Reports, agrees to a project schedule, prepares an Environmental Assessment Document which analyzes the impacts associated with each alternative. The contractor should also evaluate innovative and alternative pollution control measures and submit periodic progress reports to USEPA for concurrence. Several site visits or meetings with the MPCA and the contractors may be included.

The EPA is responsible for conducting periodic reviews of the activities performed by the MPCA. The scope of these reviews will generally address thoroughness, timeliness, documentation of activities and other issues. Each periodic review will culminate with a written report from the EPA outlining any concerns regarding the MPCA's activities and, if necessary, request written response from the MPCA.

002684

WORK STATEMENT

The following is a detailed description of the project tasks and associated costs as prepared by MPCA staff and the consulting engineering firm selected to complete the project. Figure I outlines the schedule for completing the project. The accuracy of the costs will be verified by a second consulting firm, not associated with the project. The cost for obtaining services from a second engineering firm for this purpose is estimated at \$5,000. This cost would be incurred during the first 30 days of the project.

Estimate of Cost

Principal Engineer	65 hours	\$4,420
Travel and Expenses		<u>\$ 580</u>
		\$5,000

Background on Former Reilly Tar Site

From 1917 to 1970 Reilly Tar and Chemical Company refined coal tar and treated wood with creosote. They occupied an 80-acre site in St. Louis Park, a western suburb of Minneapolis, Minnesota. The City purchased the land in 1970, upon the closing and demolition of existing structures. The site is presently mostly vacant land except for a condominium, bowling alley, and apartment buildings. Over the past several years, the many studies have identified the threat of public health, the contamination of ground water and soil and a list of remedial actions needed to correct this dangerous situation. The main contaminant involved at the site is Polynuclear Aromatic Hydrocarbon. There is a heavily contaminated area of soil on the site itself, extending off-site in the area of

FIGURE 1: PROPOSED REMEDIAL ACTION ACTIVITIES

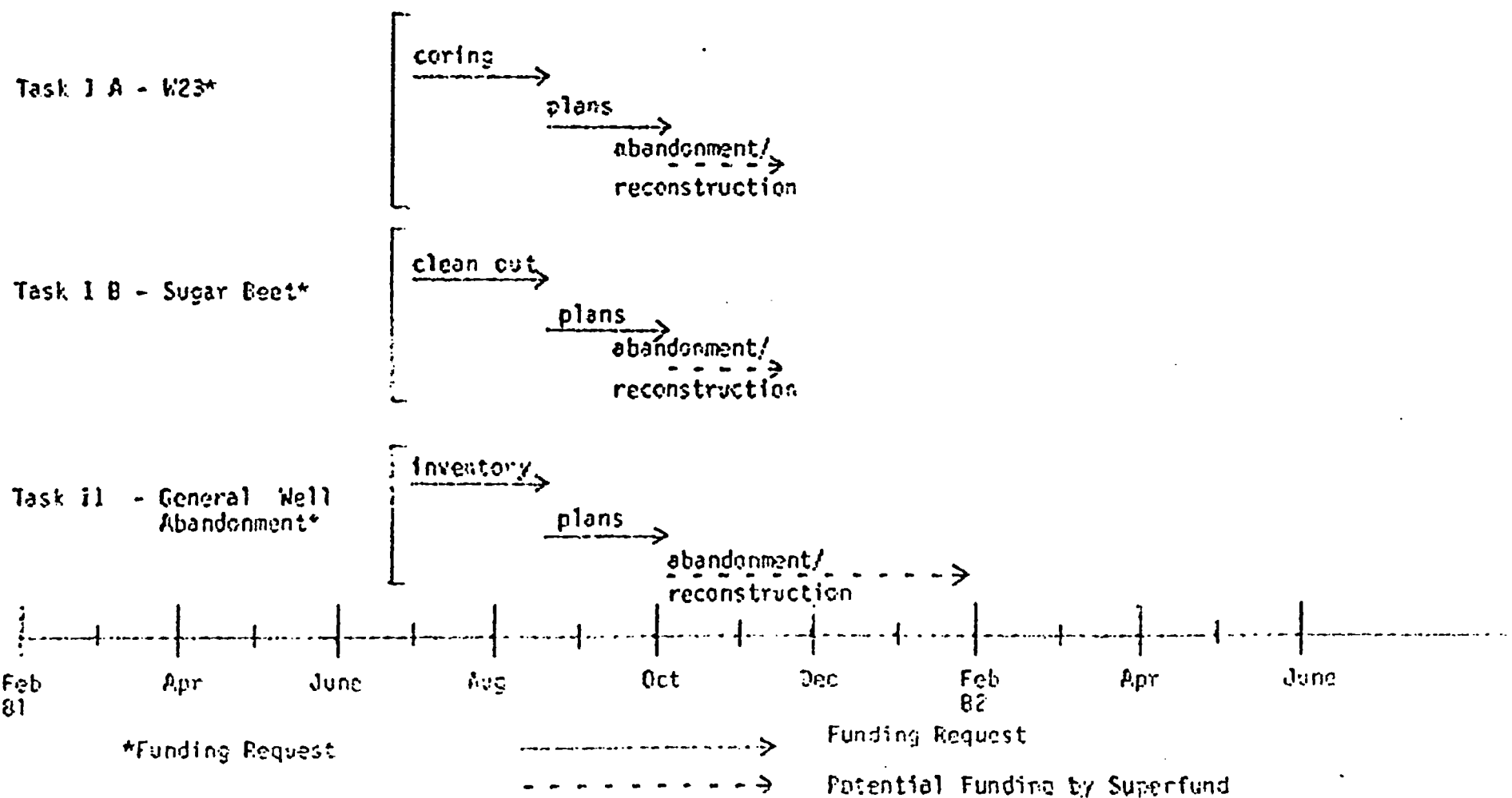
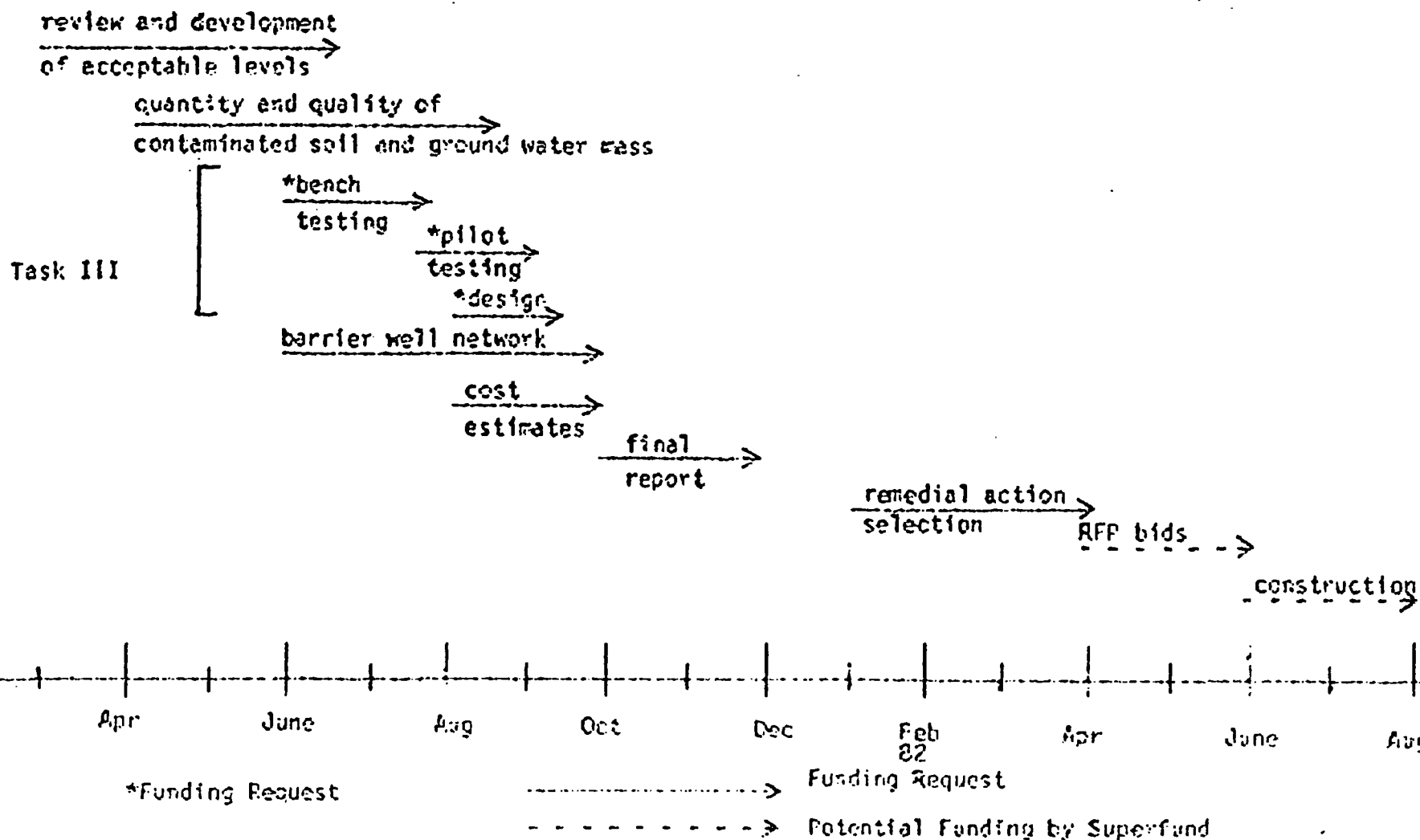


FIGURE 1: CONTINUED



002687

surface drainage. During the years of operation, Reilly utilized several storage lagoons. The site of these lagoons is also highly contaminated.

The complex ground water situation has been a vehicle for contamination of ground water within a two to three mile radius of the site, including several different aquifers.

Based on the above extensive site work already accomplished, six remedial actions have been identified as needed to clean-up the contaminants. These projects include:

1. Remove contaminated soil
2. On-site deep well remedial actions
3. Well abandonment program
4. Drinking water/well treatment program/barrier well
5. Barrier well system
6. Long-term monitoring program

Prior to Federal involvement, the MPCA and the Minnesota Health Department (MHD) have been the main agencies involved in the project. The USEPA Enforcement Division has been involved in the project for several years and on September 4, 1980 joined MPCA and St. Louis Park in a lawsuit against Reilly Tar and Chemical Company.

Based upon a rather rapid, but comprehensive series of meetings between USEPA, MPCA, MHD, and other agencies it was determined that planning for three of the six remedial actions, discussed above, could be accelerated to meet the needs of the Superfund program requirements. This accelerated planning which will

result in plans and specifications being ready by March 1, 1982 is dependent upon the availability of Headquarters supplemental funds by June 1, 1981.

The three remedial actions to be accelerated as part of this project are:

1. Well abandonment program
2. On-site well remedial actions
3. Drinking water treatment project

Cost Estimates

The engineering firm of Hickok and Associates has been instrumental in bringing the project to its current state of readiness. Hickok's experience and knowledge with this project offers benefit unavailable from a less experienced firm to the government. It will provide a dollar savings for this project and result in a faster solution to the problem. They have been retained by St. Louis Park, and by State agencies to develop needed information. Prior to Superfund involvement some work was underway to develop plans and specifications for remedial actions, but not on an acceptable timetable. MPCA and MHD, with some input from Hickok and Associates have made preliminary estimates that \$400,000 would be needed in Headquarters supplemental funds to accelerate planning of the three remedial actions discussed above. This work includes final environmental impacts, screening alternatives, preparing plans and specifications for the selected alternative, and preparation of bid packs. A complete breakdown of costs associated with each work element is provided.

Description and Cost Estimates for Tasks to be Completed During the Project Period from June 1, 1981 to March 1, 1982

- I. Abandonment of Two On-Site Wells. Investigate the extent of contamination of W23 and the extent to which coal tar derivatives have migrated from the well into the surrounding rock. Since Category A, the preliminary assessment

phase, has already been completed, this task consists of Category B - Field Investigation and Feasibility, and Category C - Engineering Design. The completion of this task, (part A and B below) will prepare the project for Category D - Implementation of Remedial Actions.

A. Investigation of W23

1. Evaluate the extent of contamination of W23. The U. S. Geological Survey (USGS) has shown that this well may have been a significant source of contaminants in the Prairie du Chien - Jordan Aquifer. The well was originally drilled to a depth of 909 feet and has since been filled with debris to a depth of 595 feet. It has been reported that contamination of the well occurred as a result of a railroad tank-car spill in the 1920's. A video survey of the well and a sample taken from the 595 foot depth have identified the presence of coal tar.

This task involves coring from a depth of 595 feet to a depth of 10 feet into the bedrock, or approximately 919 feet. Two water quality analyses will be taken before and after coring. The debris removed from the well will be sampled and analyzed every fifty (50) feet. The soil and water will be analyzed for total Polynuclear Aromatic Hydrocarbons (PAH), phenolic compounds, and Total Organic Carbon (TOC). Plans and specifications will be prepared for abandonment or reconstruction, depending on the evaluation on the well.

<u>Estimate of Cost:</u>	6 soil/sludge analyses	\$ 3,600
	4 water analyses	\$ 2,400
	plans and specifications	\$12,800
	coring	\$15,000
	removal of hazardous waste	

if encountered from 595 to 909 feet	\$ 5,000
abandonment/reconstruction specifications	\$ 2,500
	<u>\$41,300</u>

2. Evaluate the significance of coal tar, known to be in and around W23, as it contributes to the contamination of the Prairie du Chien - Jordan Aquifer. Install a test well approximately 500 feet deep; obtain cores, chemically analyze water and core samples for total PAH and phenolic compound and TOC, and install pumping facilities. The analytical data will be evaluated and plans and specifications will be prepared for well abandonment or reconstruction.

<u>Cost of Estimate:</u>	20 soil analyses	\$12,000
	4 water analyses	\$ 2,400
	drilling, casing, screen, pump	\$60,000
		<u>\$74,400</u>

- B. Evaluate extent to which the Sugar Beet Well functioned as a waste-disposal well. A letter from the 1930's has identified this well as "one of several old wells which were being used to drain creosote away into the ground". The well, originally drilled to a depth of 940 feet, has been filled with debris to a depth ten (10) feet below the land surface.

Remove debris from well and clean to original depth. Install packers and sample formation water. If hazardous wastes are encountered during clean out, cease drilling, and continue investigation by coring. Analyze approximately twenty (20) core samples and four (4) water samples for total PAH, phenolic compounds, and TOC. Prepare plans and specifications for well abandonment or reconstruction based on

an evaluation of the condition and utility of the well.

<u>Cost of Estimate:</u>	20 soil analyses	\$12,000
	4 water analyses	\$ 2,400
	drilling and/or coring	\$20,000
	abandonment/reconstruction	
	specifications	\$ 2,500
	possible removal of	
	hazardous waste	<u>\$ 5,000</u>
	TOTAL	\$41,900

- II. Off-Site Well Abandonment - Including Investigation of Wells in Study Area as a Pathway for the Spread of Contaminants. A major effort is needed to locate and evaluate all wells in the Study Area. It has been shown that wells penetrating more than one aquifer can provide a significant pathway for the spread of contaminants. This task consist of Categories B - Field Investigation and Feasibility, and Category C - Engineering Design. The completion of this task will prepare the project for Category D - Implementation of Remedial Action.

Conduct a comprehensive search and compilation of all wells in the St. Louis Park study area and develop a well-abandonment program. Prepare plans and specifications for the reconstruction or abandonment of those wells in which adequate information is available on the construction and condition of the well. For those wells in which adequate information is not available, identify the extent to which the well should be investigated (i.e., geophysical or video surveys).

<u>Estimate of Cost:</u>	Well search	\$ 5,000
	plans and specifications	<u>\$15,000</u>
		\$20,000

- III. Establishment of Barrier Well at Municipal Well 15. The purpose of this

task is two-fold. The first is to develop plans and specifications for the construction of a treatment plant for a barrier well at municipal well 15. Secondly, in order to get the design stage of the treatment plant, bench testing on a range of contaminant levels will be conducted. Data analysis from the bench testing will have application to pretreatment and or treatment design for other wells later to be constructed as part of the barrier well network.

Well 15 is located approximately one half mile north of the former Reilly Tar site. The utility of this well as a barrier well will be to decrease the spread of contaminants in the Prairie du Chien - Jordan Aquifer. Since the closure of well 15 in 1978, contaminants have spread in the aquifer southeast of the site. The migration of contaminants as a result of the closure of well 15 is the best explanation available for the contamination and subsequent closure of municipal well 4 in late 1979. The construction of the treatment plant will enable the city to put the well back in service. With well 15 pumping, the spread of contaminants should decrease in the Prairie du Chien. It is anticipated that the water quality will improve southeast of the site at well 4. The MPCA and MDH feel that the establishment of well 15 as a barrier well will be part of any overall remedial action program for the site.

Plans and specifications of a treatment plant for a barrier well at municipal well 15 could be prepared with the completion of the following tasks A, B, and C. Tasks A, B, C (as identified below) fit Category C - Engineering Design. The completion of these tasks prepares the project for Category D - Implementation of Remedial Actions.

A. Investigate Potential for Removal of Various Levels of Contaminants in Water Using Activated Carbon. A gradient-control well network is currently under investigation for implementation in all aquifers in the Study Area. The quality of the water in the aquifers varies from heavily contaminated water with several hydrocarbon phases to water with contaminants present in parts per billion.

Conduct bench testings on a range of heavily to lightly contaminated water (i.e., USGS well 13 and municipal well 15). Laboratory work will determine or verify the following.

- 1) Isotherm test
- 2) Carbon test
- 3) Effect of linear flow rate and contact time
- 4) Effect of pH
- 5) Effect of temperature
- 6) Adsorptive capacity
- 7) Type of carbon

<u>Estimate of Cost:</u>	Principal Engineer	16 hours	\$ 1,088
	Program Manager	160 hours	\$ 7,680
	Chemist	752 hours	\$18,048
	Outside analytical		\$27,600
	Materials		\$ 780
		TOTAL	<u>\$55,196</u>

B. Conduct a Pilot Plant Study for the Removal of PAH Compounds from St. Louis Park Well 15. Well 15 draws water from Prairie du Chien - Jordan Aquifer which has been closed for municipal water supply due to high levels of PAH compounds. The closing of this well has resulted in increased contaminant migration away from the contamination center. The pilot plant would be used to investigate the removal of PAH

compounds from a high capacity well constructed in the Prairie du Chien - Jordan Aquifer. The operation of the pilot plant would be tested under four (4) runs of ten (10) days each for a total of forty (40) days. Upon completion, the data would be analyzed, and design criteria established for a treatment plant.

<u>Estimate of Cost:</u>	<u>Pilot Plant Construction and Test Runs</u>		
	Principal Engineer	16 hours	\$ 1,088
	Program Manager	40 hours	\$ 1,920
	Senior Engineer	80 hours	\$ 2,400
	Senior Technician	320 hours	\$ 8,640
	Chemist	80 hours	\$ 1,920
	Laboratory Outside Services - 180 samp @ \$150.00		<u>\$27,000</u>
	TOTAL		\$43,400
	<u>Evaluation of Analytical Data from Pilot Plant Test Runs and Establishment of Design Criteria</u>		
	Principal Engineer	16 hours	\$1,088
	Program Manager	40 hours	\$1,920
	Senior Engineer	80 hours	\$2,440
	Senior Technician	40 hours	\$1,080
	Chemist	20 hours	<u>\$ 480</u>
	TOTAL		\$6,968

- C. Prepare Plans and Specification for Water Treatment at Well 15. The existing treatment plant will be utilized in the design of this existing deep, high capacity well, representing substantial capital investment, is advantageous for the following reasons: (1) the well is ready for immediate use for gradient control, which will retard the spread of contamination, provided only that treatment facilities are designed and constructed to make the pumped water usable; (2) needed public water supply will thereby be provided, and the water will not be wasted; (3) no matter what ultimate remedial actions are implemented,

the use of well number 15 for gradient control will be beneficial and can be easily incorporated into the overall scheme, because it is located relatively near to the contamination center in the Prairie du Chien - Jordan Aquifer; (4) as noted, the existing well represents substantial capital and its use will therefore be a double saving (i.e., it is a bonus for remedial actions, and its use prevents the "writing off" of a previous public investment); (5) disposal of pumped water in the vicinity of well number 15 by means other than using it for water supply would be difficult due to location far from suitable receiving waters and the fact that some degree of treatment would be required in any case.

<u>Estimate of Cost:</u>	Principal	265	\$18,020
	Program Manager	350	\$16,800
	Senior Engineer	520	\$15,600
	Senior Technician	660	\$17,820
	Technician	680	\$12,240
	Outside Services		
	- Structural		
	- Electrical		\$ 6,500
	- Mechanical		\$ 8,200
	Specification Preparation	80	\$ 1,200
	Printing 50 @ \$25.000		<u>\$ 1,250</u>
	TOTAL		\$106,836

IV. Summary of Tasks to be Completed During the Project Period From June 1, 1981 to March 1, 1982

Priority Ranking	Status*	Estimate of Cost	Task Description
1			I. Abandonment of two on-site wells **
			A. Investigation of W23
	B1	38,800	1) Evaluate the extent of contamination of W23.
	C1	2,500	Prepare plans and specifications for abandonment or reconstruction based on the evaluation of the well
	B1	74,400	2) Evaluate the significance of coal tar known to be in and around W23
	B2	39,400	B. Evaluate extent to which the Sugar Beet Well functioned as a wastewater disposal site
		<u>155,100</u>	Prepare plans and specifications for abandonment or reconstruction, based on the evaluation of the well
2			II. Off-site Well Abandonment **
	B3	5,000	Well search
	C3	15,000	Prepare plans and specifications for abandonment or reconstruction, based on the evaluation of the well
		<u>20,000</u>	
3			III. Establishment of a barrier well at municipal well 15 **
	B4	55,196	A. Investigate potential for removal of various levels of contaminants in water using activated carbon
		<u>175,000</u>	

002697

Priority Ranking	Status*	Estimate of Cost	Task Description
	B4		B. Conduct a pilot plant study for the removal of PAH compounds
		43,400	1) Pilot plant construction and test runs
		6,968	2) Evaluation of analytical data from pilot plant test runs and establishment of design criteria
	C4	106,836	C. Prepare plans and specifications for water treatment at well 15
	TOTAL	\$395,000	

*Status refers to categories depicting status of sites as described in EPA memorandum from Michael B. Cook to Regional Administrators, January 19, 1981

completion of C1 is dependent on B1 ** This includes the development and screening of alternatives, preparing a cost effective analysis and an environmental assessment.
 completion of C2 is dependent on B2
 completion of C3 is dependent on B3
 completion of C4 is dependent on B4

COMMUNITY RELATIONS PLAN

The Minnesota Pollution Control Agency's (MPCA) Public Information Office has prepared the following community relations program utilizing the Interim Community Relations Guidance for site clean-up prepared by Michael B. Cook. The citizen concern and technical complexity of the engineering plans were judged medium, as defined in the guidance memo. The community relations plan is consistent with the guidelines for medium community concern and medium technical complexity. The MPCA Public Information Office is responsible for executing the program. The costs incurred during the execution of the community relations plan are included in the indirect charges. *The Community*

1. Narrative

One measure of the success of cleaning up the Reilly Tar and Chemical waste-site in St. Louis Park will be the public's satisfaction with the end result. While few citizens would oppose the idea of cleaning up the waste-site and solving the public health problem, some may resent an undertaking carried-out without local consultation.

To ensure public understanding of - and public support for - the clean-up program, the MPCA believes that a citizen's advisory council is needed. Through meetings, monthly newsletters, and regular news releases this group would be kept abreast of both the MPCA's immediate and long range goals and how these objectives were progressing. An active, informed group will help the MPCA's efforts to consider public concerns and viewpoints when making decisions. In addition to providing the community itself with a reliable source of direct information.

The public participation program proposed for the Reilly Tar and Chemical situation has the following objectives:

1. To promote expeditious resolution and abatement of pollution and public health problems;
2. To make certain the citizenry understands what various agencies propose to do;
3. To show that the agencies involved consult with all affected and interested parties in a good-faith effort to consider public concerns and viewpoints when decisions are made;
4. To keep the citizenry updated on progress and new developments;
5. To make sure the agencies are accessible and responsive throughout the process.

The estimated cost of such a program is \$7,343. Sections II and III of this attachment identify public participation program elements and provide a breakdown of estimated program costs.

II. <u>Participation Plan Elements</u>	<u>Cost</u>
1. Initial Public Meeting News Release A news release will be sent to appropriate electronic and print media, and community leaders announcing the time, place, and purpose of the meeting.	\$150
2. Fact Sheets in Preparation for Initial Public Meeting Four fact sheets will be prepared on the Keilly lar situation reflecting; the historic background, the legal standing, the proposed clean-up strategies, and basic information on the nature of ground water and the specific aquifers involved in St. Louis Park.	\$800
3. Prepare Visuals of St. Louis Park Aquifer Situation - Treatment Strategies - Well Abandonment Visual presentations will give a more concrete grasp of the aquifers, and the strategies and treatments being considered. These will be copied and handed out at first public meeting.	\$360
4. Initial Public Meeting -Status of Situation -Presentation of Fact Sheets -Solicitation for Advisory Committee Application -Mailing list sign-up	\$960

002700

This open meeting will solicit applications for the citizens advisory committee, and explain the issues in a broad sense, through the presentation of the fact sheets and visual diagrams. All interested parties will be brought up-to-date on the situation. MPCA technical staff will be available to present materials and answer questions.

5. Formation of Advisory Committee \$320
All applications will be reviewed by appropriate MPCA staff. Committee members will be chosen on the basis of the four standard EPA public participation group guidelines.
6. News Release Announcing Advisory Committee \$150
A routine news release will be sent to appropriate electronic and print media, and community leaders, describing the committee, its charge, and the format for its meetings.
7. Advisory Committee Meeting Every Eight Weeks or More Often if Needed \$960
At first meeting, members would be "trained" - that is, their responsibilities delineated. Approximately every eight weeks thereafter, the advisory committee will meet with appropriate MPCA staff.
8. News Release Approximately Every Eight Weeks \$1280
After each advisory committee meeting, a summary-type news release will be sent to: advisory committee, people attending meetings, St. Louis Park publications, local/county officials, Chamber of Commerce, religious institutions, special interest groups. These will function as newsletters.
9. Follow-up Public Meeting \$600
A meeting will be held at the end of the project period to summarize the program and layout future plans.
10. Responsiveness Summary \$1600
This will be prepared in accordance with EPA guidelines.
11. Periodic News Release (Following Advisory Committee Meeting)
(estimated three meetings = estimated three news releases) 100 copies

-envelope	.03		3.00		9.00	
-xerox	.05	X 100	5.00	X 3 mailings =	15.00	
-postage	.05		5.00		15.00	
					<u>\$39.00</u>	
12. Fact Sheets (100 copies of the four sheets at two pages each)

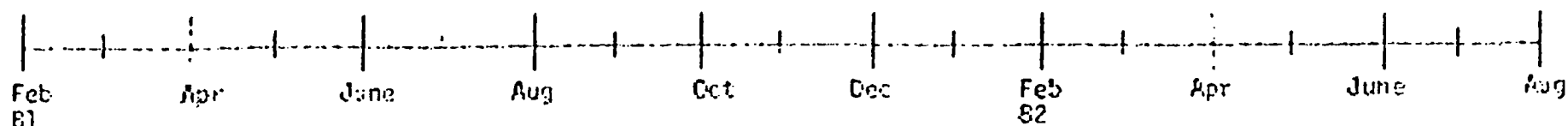
-paper	.03		3.00		12.00	24.00
-xerox	.05	X 100	5.00	X 4	20.00	X 2 40.00
						<u>\$64.00</u>
13. Visual Materials \$60
-four maps

 \$7,343

002701

FIGURE 2: COMMUNITY RELATIONS PLAN

- * initial public meeting news release
- * fact sheets for initial meeting
- * visual displays for initial meeting
- * initial public meeting (solicit advisory committee applications)
- * advisory committee formed
- * first advisory committee meeting
- * news release
- * second advisory committee meeting
- * news release
- * third advisory committee meeting
- * news release
- * final public meeting
- * final news release



002702

BUDGET SUMMARY
 Cost Explanation for Personnel, Travel
 Supplies and Contractual
 June 1, 1981 - March 1, 1981

<u>Personnel</u>	<u>Man-Hour</u>	<u>Hourly Rate</u>	<u>Cost</u>
Hydrogeologist	1,175	\$10.85	\$12,753
<u>Fringe Benefits -</u> consist of retirement, FICA, Insurance, each at 6% (18% total)			\$ 2,507
<u>Indirect Charges</u> 42.3% of personnel and Fringe			\$ 6,455
<u>Travel</u> 3/2 day trips to Chicago Region V for Project Coordination		150 Per Diem 155 Air Fare 60 Cab Fare 365/per trip	
Use of State Vehicle for site inspections		155	\$1,250
<u>Contractual</u>	See Appendix F	TOTAL	\$422,965

002703

SPECIAL TERMS AND CONDITIONS

1. The recipient agrees to the following conditions in accepting this cooperative agreement under the letter of credit method of financing:

- a. It will make a cash drawdowns only as actually needed for its disbursements;
- b. It will provide timely reporting of cash disbursements and balances as required by the EPA Letter of Credit User's Manual; and
- c. It will impose the same standards of timing and reporting on secondary recipients, if any.

Failure on the part of the recipient to comply with the above conditions may cause the unobligated portion of the letter of credit to be revoked, and the financing method changed to a reimbursable basis.

2. This cooperative agreement is awarded in accordance with the Federal Grant and Cooperative Agreement Act of 1977.
3. In accepting this cooperative agreement the recipient agreed to comply with Attachment P to OMB Circular A-102 (44FR 60959, October 22, 1979), as amended (45FR 5966B, February 10, 1980).
4. EPA and recipient will conduct periodic review of project status. Recipient will make sure schedules are met. EPA will review comments, concur on reports recommendations, specifications, and decisions. EPA will coordinate and establish procedures for State/EPA involvement on future remedial action.
5. Note that the Community Relations Plan is not covered by the cooperative agreement. None of the funds in the cooperative agreement may be used for these community relations activities unless specifically amended at a later date.

002704

BUDGET SUMMARY
 Cost Explanation for Personnel, Travel
 Supplies and Contractual
 June 1, 1981 - March 1, 1981

<u>Personnel</u>	<u>Man-Hour</u>	<u>Hourly Rate</u>	<u>Cost</u>
Hydrogeologist	1,175	\$10.85	\$12,753
<u>Fringe Benefits -</u> consist of retirement, FICA, Insurance, each at 6% (18% total)			\$ 2,507
<u>Indirect Charges</u> 42.3% of personnel and Fringe			\$ 6,455
<u>Travel</u> 3/2 day trips to Chicago Region V for Project Coordination		150 Per Diem 155 Air Fare 60 Cab Fare 365/per trip	
Use of State Vehicle for site inspections		155	\$1,250
<u>Contractual</u>	See Appendix F	TOTAL	\$422,965

002705

COMMUNITY RELATIONS PLAN

The Minnesota Pollution Control Agency's (MPCA) Public Information Office has prepared the following community relations program utilizing the Interim Community Relations Guidance for site clean-up prepared by Michael B. Cook. The citizen concern and technical complexity of the engineering plans were judged medium, as defined in the guidance memo. The community relations plan is consistent with the guidelines for medium community concern and medium technical complexity. The MPCA Public Information Office is responsible for executing the program. The costs incurred during the execution of the community relations plan are included in the indirect charges.

I. Narrative

One measure of the success of cleaning up the Reilly Tar and Chemical waste-site in St. Louis Park will be the public's satisfaction with the end result. While few citizens would oppose the idea of cleaning up the waste-site and solving the public health problem, some may resent an undertaking carried-out without local consultation.

To ensure public understanding of - and public support for - the clean-up program, the MPCA believes that a citizen's advisory council is needed. Through meetings, monthly newsletters, and regular news releases this group would be kept abreast of both the MPCA's immediate and long range goals and how these objectives were progressing. An active, informed group will help the MPCA's efforts to consider public concerns and viewpoints when making decisions, in addition to providing the community itself with a reliable source of direct information.

The public participation program proposed for the Reilly Tar and Chemical situation has the following objectives:

002706

1. To promote expeditious resolution and abatement of pollution and public health problems;
2. To make certain the citizenry understands what various agencies propose to do;
3. To show that the agencies involved consult with all affected and interested parties in a good-faith effort to consider public concerns and viewpoints when decisions are made;
4. To keep the citizenry updated on progress and new developments;
5. To make sure the agencies are accessible and responsive throughout the process.

The estimated cost of such a program is \$7,343. Sections II and III of this attachment identify public participation program elements and provide a breakdown of estimated program costs.

II. <u>Participation Plan Elements</u>	<u>Cost</u>
1. Initial Public Meeting News Release A news release will be sent to appropriate electronic and print media, and community leaders announcing the time, place, and purpose of the meeting.	\$150
2. Fact Sheets in Preparation for Initial Public Meeting Four fact sheets will be prepared on the Reilly Tar situation reflecting; the historic background, the legal standing, the proposed clean-up strategies, and basic information on the nature of ground water and the specific aquifers involved in St. Louis Park.	\$800
3. Prepare Visuals of St. Louis Park Aquifer Situation - Treatment Strategies - Well Abandonment Visual presentations will give a more concrete grasp of the aquifers, and the strategies and treatments being considered. These will be copied and handed out at first public meeting.	\$360
4. Initial Public Meeting -Status of Situation -Presentation of Fact Sheets -Solicitation for Advisory Committee Application -Mailing list sign-up	\$960

002707

Cost

This open meeting will solicit applications for the citizens advisory committee, and explain the issues in a broad sense, through the presentation of the fact sheets and visual diagrams. All interested parties will be brought up-to-date on the situation. MPCA technical staff will be available to present materials and answer questions.

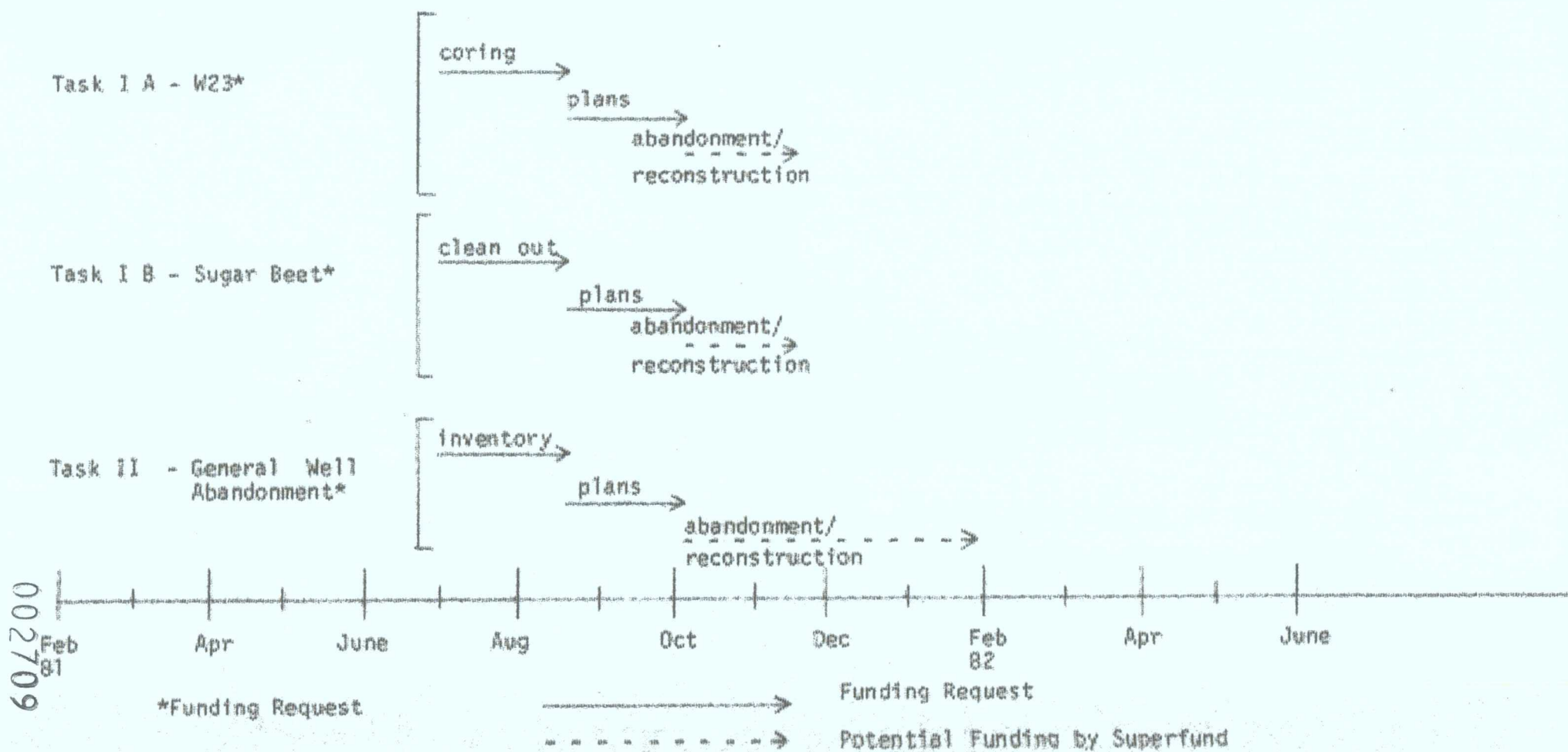
5. Formation of Advisory Committee \$320
All applications will be reviewed by appropriate MPCA staff. Committee members will be chosen on the basis of the four standard EPA public participation group guidelines.
6. News Release Announcing Advisory Committee \$150
A routine news release will be sent to appropriate electronic and print media, and community leaders, describing the committee, its charge, and the format for its meetings.
7. Advisory Committee Meeting Every Eight Weeks or More Often if Needed \$960
At first meeting, members would be "trained" - that is, their responsibilities delineated. Approximately every eight weeks thereafter, the advisory committee will meet with appropriate MPCA staff.
8. News Release Approximately Every Eight Weeks \$1280
After each advisory committee meeting, a summary-type news release will be sent to: advisory committee, people attending meetings, St. Louis Park publications, local/county officials, Chamber of Commerce, religious institutions, special interest groups. These will function as newsletters.
9. Follow-up Public Meeting \$600
A meeting will be held at the end of the project period to summarize the program and layout future plans.
10. Responsiveness Summary \$1600
This will be prepared in accordance with EPA guidelines.
11. Periodic News Release (Following Advisory Committee Meeting)
(estimated three meetings = estimated three news releases) 100 copies

-envelope	.03	3.00	9.00	
-xerox	.05	X 100	5.00	X 3 mailings = 15.00
-postage	.05	5.00	15.00	
			<u>\$39.00</u>	
12. Fact Sheets (100 copies of the four sheets at two pages each)

-paper	.03	3.00	12.00	24.00
-xerox	.05	X 100	5.00	X 4
			20.00	X 2
				<u>\$64.00</u>
13. Visual Materials \$60
-four maps

002708
\$7,343

FIGURE 1: PROPOSED REMEDIAL ACTION ACTIVITIES



002710

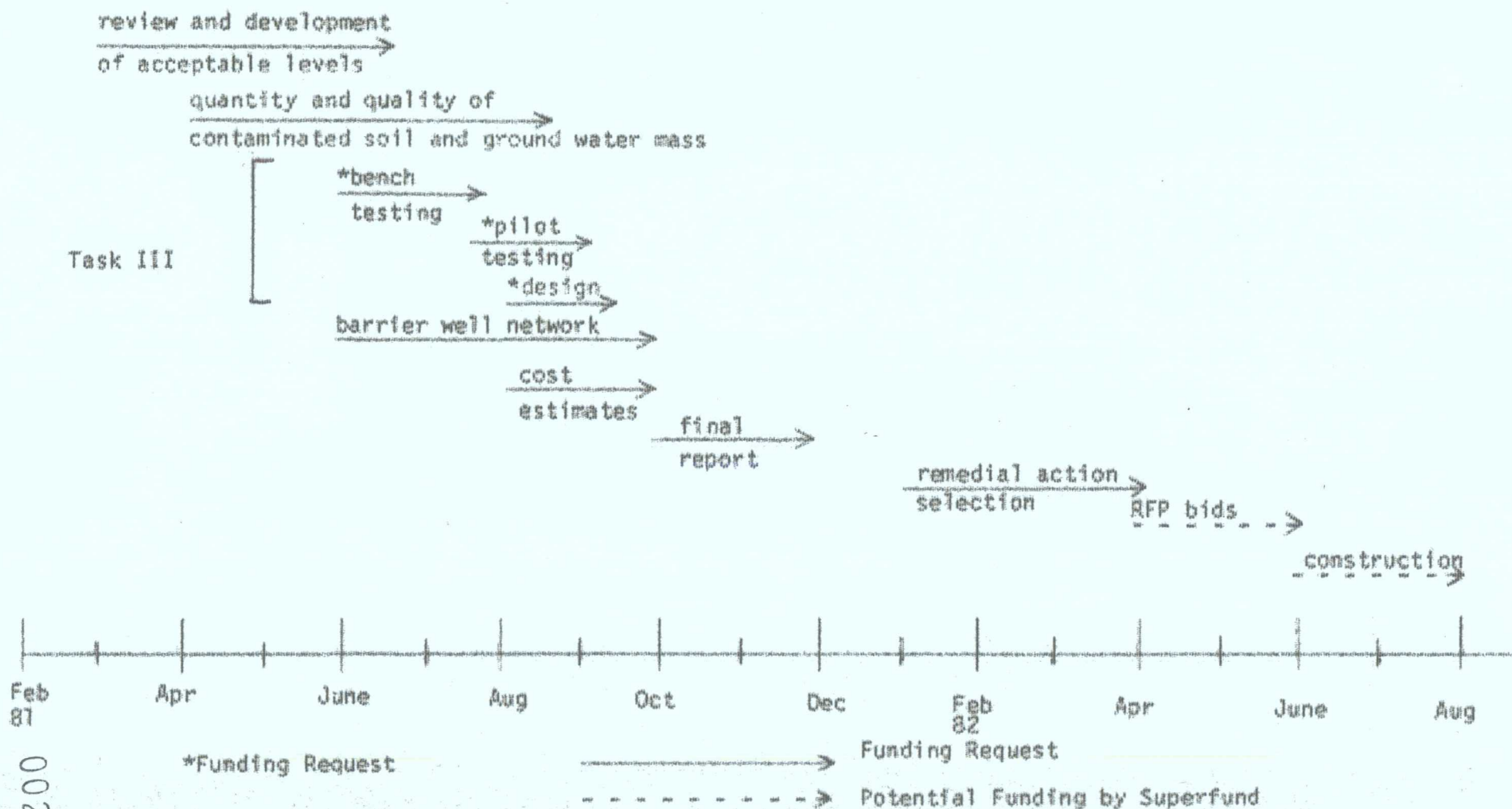


FIGURE 2: COMMUNITY RELATIONS PLAN

- * initial public meeting news release
- * fact sheets for initial meeting
- * visual displays for initial meeting
- * initial public meeting (solicit advisory committee applications)
- * advisory committee formed
- * first advisory committee meeting
- * news release
- * second advisory committee meeting
- * news release
- * third advisory committee meeting
- * news release
- * final public meeting
- * final news release





Minnesota Pollution Control Agency

Mr. Richard Bartelt
U.S. Environmental Protection Agency
Office of Superfund
111 West Jackson
Chicago, Illinois 60604

Dear Mr. Bartelt:

The purpose of this letter is to provide a Statement of Compliance to be attached to the Minnesota Pollution Control Agency's (MPCA) application to enter into a Cooperative Agreement with the U.S. Environmental Protection Agency (EPA). The purpose of the Cooperative Agreement is to outline agreements between the EPA and the MPCA relative to a program to be undertaken for \$400,000. The EPA has set aside the \$400,000 for the preparation of plans and specifications for remedial actions for the former Reilly Tar and Chemical Site in St. Louis Park.

The MPCA agrees to the terms and conditions prescribed by the General Grant regulations (40 CFR 30) and with Attachment O of OMB Circular A-102.

Sincerely,

Louis J. Breimhurst
Executive Director

LJB/dc

SPECIAL TERMS AND CONDITIONS

1. The recipient agrees to the following conditions in accepting this cooperative agreement under the letter of credit method of financing:
 - a) It will make cash drawdowns only as actually needed for its disbursements;
 - b) It will provide timely reporting of cash disbursements and balances as required by the EPA Letter of Credit User's Manual; and
 - c) It will impose the same standards of timing and reporting on secondary recipients, if any.

Failure on the part of the recipient to comply with the above conditions may cause the unobligated portion of the letter of credit to be revoked, and the financing method changed to a reimbursable basis.

2. This cooperative agreement is awarded in accordance with the Federal Grant and Cooperative Agreement Act of 1977.
3. In accepting this cooperative agreement the recipient agrees to comply with Attachment P to OMB Circular A-102 (44FR 60959, October 22, 1979), as amended (45FR 59668, September 10, 1980).
4. ~~The attached pages contain task and amounts which are revisions or amendments to the Colorado FY81 State/EPA Agreement. Acceptance of this cooperative agreement revises the SEA according to these pages.~~
7,343
5. The community relations effort is limited to the identified expenditures of ~~\$17,000~~. No additional RCRA monies will be spent on community relations for ~~these 31 sites.~~
this site.
6. EPA and recipient will conduct periodic review of project status. Recipient will make sure schedules are met. EPA will review comments, concur on reports, recommendations, specifications, and decisions. EPA will coordinate and establish procedures for State/EPA involvement on future remedial action.

RECEIVED

052713

MAY 28 1981

MINN. POLLUTION